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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500

DENVER, COLORADO 80202-2405

NOV 12 1991

Ref: 8HWM-FF

Mr. Frazer Lockhart
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402

Dear Mr. Lockhart,

The purpose of this letter is to: 1) grant approval of the Administrative Record Index for Operable Unit 4 (OU4) IM/IRA dated October 28, 1991; and 2) provide DOE with guidance in the development of the Administrative Record Index for Rocky Flats Plant.

EPA completed the review of the Administrative Record Index for OU 4. It is EPA's evaluation that this Administrative Record Index is adequate to support the proposed IM/IRA for OU4. However, there are still some documents related to OU4 which may be relevant to the final remedy and that need to be incorporated. EPA would like to meet with DOE as soon as possible to discuss remaining issues pertaining to this Administrative Record Index. DOE must place this Administrative Record Index in the reading rooms immediately upon receiving this letter.

Section 300.815 of Subpart I of the NCP states that the administrative record file for the selection of a remedial action shall be available for public inspection at the commencement of the remedial investigation phase. In addition, Part 44 of the IAG states that DOE shall establish and maintain an Administrative Record Index at or near the Site in accordance with section 113(k) of CERCLA and EPA policy and guidance. Therefore, DOE shall establish and make available to all the interested parties, the Administrative Record Index supporting a response action during the remedial investigation phase, and not later than DOE's release of a proposed decision document for public comment. In addition, the Administrative Record Index for all OUs shall be updated on a quarterly basis.

ADMIN RECORD

A-SW-000229

If you have any comments or questions regarding this matter, please do not hesitate to contact Arturo Duran of my staff at 294-1080.

Sincerely,

Martin Hestmark

Martin Hestmark, Manager
Rocky Flats Project

cc: Rich Schassburger, DOE
Gary Baughman, CDH
Noreen Matsuura, CDH
Peter Ornstein, 8RC
Sonya Pennock, 80EA
Arturo Duran, 8HWM-FF

This is a
CONTROLLED DOCUMENT

EG&G — ROCKY FLATS PLANT
ENVIRONMENTAL MANAGEMENT DEPARTMENT

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Category 1	Organization:	Environmental Management

Title:
READINESS REVIEW

Approved By


Director, Environmental Management

8/2/91
Date

1.0 PURPOSE

This procedure defines the method and responsibilities for performing Readiness Reviews for environmental management activities conducted by the Rocky Flats Plant (RFP) Environmental Management (EM) Department. This method provides a means for determining and documenting that an activity is ready to proceed to the next phase (i.e., from planning to initiation of site characterization or remediation). When performed, readiness reviews verify that specified prerequisites and requirements have been satisfied prior to the start of each phase of an activity such as investigation/remediation at each Operable Unit.

2.0 SCOPE

This procedure applies to Environmental Management Department activities discussed in the Statement of Work of the Final Environmental Restoration Inter-Agency Agreement (IAG) or other activities designated by the EMD Manager. Specifically readiness reviews shall be performed prior to the initiation of any RFI/RI workplan or other activity specified by the responsible manager. This procedure applies to all EM Department personnel and to contractors/subcontractors when participating in readiness reviews for the EM Department.

Readiness Reviews are performed on environmental management activities. If a readiness review is required by higher level procedures, this procedure does not supersede the higher level procedure. The EMD Manager may at his/her discretion require completion of this procedure even if a readiness review is to be done or is required by a on higher level procedures.

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3.0 TERMS/DEFINITIONS

- 3.1 **Operable Unit (OU)** - Groupings of individual hazardous substance sites into a single management area, as detailed in the IAG Statement of Work.
- 3.2 **Environmental Management Activities** - The elements of work required to be performed to respond to all hazardous substance releases or threat of releases at or from the U.S. DOE RFP, which may cause harm to human health or the environment. These elements of work are detailed in the IAG Statement of Work and include work to be performed during the investigatory and study phase of the response process, interim measures and remedial actions, baseline risk assessments, and treatability studies.
- 3.3 **Work Plan/Field Sampling Plan (WP/FSP)** - Detailed plans developed for each OU and selected site-wide activities such as environmental evaluations and treatability studies that assure that each site is fully characterized and that a Baseline Risk Assessment is performed. In addition to the detailed technical discussion, each WP/FSP shall include the following:
1. Quality Assurance Addendum (QAA), which outlines those site- or project-specific measures taken to meet the QA requirements of the Site-Wide Quality Assurance Project Plan (QAPjP).
 2. Data Quality Objectives, which are qualitative and quantitative statements that specify quality of data required to support decisions.
 3. Operating Procedures (OPs), or PCNs if applicable to supplement existing procedures, that are required to implement the WP/FSP.
- 3.4 **Readiness Review Board** (hereinafter referred to as the Board) - A group of qualified independent individuals selected to determine the readiness of an activity to proceed. This board will be headed by the EM Department Quality Assurance Program Manager (QAPM) who is referred to herein as the Readiness Review Board Chairperson.

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3.5 **Readiness Review Team** (hereinafter referred to as the Team) - A group of individuals who are cognizant of the WP/FSP and other activity prerequisites. The purpose of this Team is to demonstrate to the Board the readiness of the activity to proceed (i.e., demonstrate that all prerequisites have been met). This Team will be headed by a Readiness Review Team Leader.

3.6 **Readiness Review Notice** - A memorandum or document that provides the following:

1. Readiness Review scope and purpose identifying areas and items to be reviewed.
2. Planned Readiness Review date, time, location, and other logistical information for the review meeting.
3. Identification of the Readiness Review Board Chairperson.

An example of a Readiness Review Notice is included as Attachment 1.

3.7 **Readiness Review Checklist** - A list of prerequisites, requirements, and other information that forms the basis for the Readiness Review and provides evidence for determining readiness.

3.8 **Readiness Review Board Selection Record** - A document that identifies the functions involved in the review and the names of individuals selected to be on the Readiness Review Board. An example of a Readiness Review Board Selection Record is shown in Attachment 2.

3.9 **Readiness Review Record Memorandum** - A documented summary of the Readiness Review prepared by the Readiness Review Team Secretary. The Memorandum includes, as applicable, the following items:

1. Readiness Review Notice.
2. Readiness Review Board Selection Record.
3. Completed Checklist with Signature of the Team Chairperson.

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4. Completed Readiness Review Comment Record Form containing the Board's comments and the Team's resolutions, including any open items. An example Review Comment Record Form is shown in Attachment 3.
5. Evaluation and recommendation of readiness by the Board.
6. Readiness decision documentation.
7. Agenda of Readiness Review Team activities, as appropriate.

4.0 RESPONSIBILITIES

NOTE

Unless prohibited by other requirements, responsibilities stated herein may be delegated in writing to other individuals or organizations. However, responsibility for the adequacy and effectiveness of the activities remains the responsibility as stated herein.

4.1 The EM Department Director is responsible for the implementation and conduct of environmental management IAG program activities. As such, the Director is responsible for approving or disapproving the Board's recommendations and shall provide final resolution on any disputes that cannot be resolved by the Board Chairperson.

4.2 The Readiness Review Board Chairperson is responsible for:

1. Selecting Board members and ensuring that they are trained in this procedure and other applicable documents.
2. Selecting Readiness Review Team Leader.

4.3 The Readiness Review Team Leader is responsible for selecting Team members and Team Secretary, as appropriate, and ensuring that they are trained in this procedure.

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4.4 The Readiness Review Board is responsible for:

1. Approving Readiness Review Checklist.
2. Review, comment, and approval of completed Checklist.
3. Approving Readiness Review Record Memorandum.
4. Providing recommendation of readiness.

4.5 The Readiness Review Team is responsible for:

1. Preparing and completing Readiness Review Checklist.
2. Preparing dispositions to the Board's comments.

4.6 The Readiness Review Team Secretary is responsible for:

1. Preparing Readiness Review Record Memorandum.
2. Distributing copies of Memorandum to responsible parties and the affected organizations and contractor(s)/subcontractor(s).
3. Submitting Memorandum to EM Department Records Management.

5.0 PROCEDURE

Readiness Reviews for environmental management activities shall be developed and controlled per the following procedure.

5.1 Preparation of the Readiness Review Notice

- 5.1.1 The Readiness Review Board Chairperson shall prepare the Readiness Review Notice (Attachment 1) and submit it to the EM Department Director and Remediation Programs Division Manager.

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5.2 Selection of the Board and Team

- 5.2.1 The Board Chairperson shall select the members of the Board and complete, sign, and date the Readiness Review Board Selection Record (Attachment 2), or equivalent alternative.
- 5.2.2 The Board Chairperson and members shall complete training in this procedure and other applicable documents deemed appropriate by the Chairperson per the requirements in 3-21000-ADM, 02.01, Indoctrination and Training.
- 5.2.3 The Board Chairperson shall select a Readiness Review Team Leader. The Team Leader is typically, but not necessarily, from the affected organization or contractor/subcontractor.
- 5.2.4 The Board Chairperson shall select the Readiness Review Team members and the Team Secretary.
- 5.2.5 The Team Leader, members, and secretary shall complete training in this procedure and indoctrination and training required by 3-21000-ADM, 02.01.

5.3 Prepare Checklist

- 5.3.1 The Team shall prepare the Readiness Review Checklist. To assure all items are addressed, fault-free or other formal analytical methods should be used in preparing these checklists. The checklist will contain, at a minimum, the following:
 - 1. Checklist questions, which are focused so that, at a minimum, the following prerequisites are addressed below. For non-RFI/RI activities, similar areas should be addressed.

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a. Development of WP/FSPs and approval by the:

- . RPD Manager,
- . EM Department Director,
- . DOE,
- . EPA, and
- . State of Colorado, as appropriate.

For Phase II and III RCRA Facility Investigation/Remedial Investigation WP/FSPs, the previous phase RFI/RI Report shall have been submitted to and approved by the EPA and State.

Development of the Final Interim Measure/Interim Remedial Action (IM/IRA) Decision Document and Responsiveness Summary and approval by the:

- . RPD Manager,
- . EM Department Director,
- . DOE,
- . EPA, and
- . State

prior to initiating any remedial/corrective activities, except for emergency removals, associated with an IM/IRA.

Development of the Treatability Study Plan and approval by the:

- . RPD Manager,
- . EM Department Director,

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- . DOE,
- . EPA, and
- . the State prior to initiating the treatability study program.
- b. Verification that QA requirements of the QAPjP and EM Quality Assurance Program Description (QAPD) have been met and that OPSSs have been developed, reviewed, and approved for adequacy and appropriateness.
- c. WP/FSP reviewed (per 3-21000-ADM-05.05) by the NEPA, CAEM, and CWA Division Managers, or designees, to assure that planned activities are in compliance with applicable Federal, State, and local environmental laws and regulations.
- d. Verification that personnel have been suitably trained, indoctrinated, and qualified.
- e. Verification that Health and Safety (H&S) requirements have been met and that site- or project-specific H&S plans have been developed, approved, and implemented, as appropriate.
- f. Verification that applicable Rocky Flats Plant requirements have been identified and have been met.
- g. Verify that the management system and procedures are in place to implement the activities.
- h. Verify the subcontracts, equipment, supplies, and materials required to implement the activity will be in place when required.

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i. Verify that the required permits, authorizations, and environmental documentation will be in place when required.

j. Verify that EMAD, has reviewed the Workplan for impact on resources.

2. Space for comments and resolutions.

3. Approval signature of the Board Chairperson.

5.3.2 The Team Leader shall approve the Checklist and submit it to the Board for approval.

5.3.3 The Board shall review and approve or comment on the Checklist and send back to the Team for completion or revision.

5.3.4 If the Checklist needs to be revised, per the Board's comments, the Team shall make the necessary revisions and resubmit it to the Board for approval.

5.4 Complete Checklist

5.4.1 The Team shall complete the Checklist based on objective evidence supporting readiness. If open items remain, the Team shall provide documented commitments to close the open items.

5.5 Conduct Review

5.5.1 The Team Leader shall approve and date the completed Checklist and forward to the Board. A Readiness Review Comment Record (Attachment 3) shall accompany the completed Checklist.

5.5.2 The Board shall review the completed Checklist and provide comments to the Team for resolution. Comments shall be provided on the Readiness Review Comment Record.

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5.6 Resolution of Comments

If the Board does not have any comments or concerns regarding the completed Checklist, they can bypass the following steps within this section and proceed to Section 5.7. If the Board has comments on the completed Checklist that need to be resolved by the Team, the following steps shall be implemented.

- 5.6.1 The Team shall prepare the disposition to the Board's comments.
- 5.6.2 The Team Leader and selected Team members and the commenting Board member(s) will discuss the comments and dispositions and come to agreement. The agreement shall be documented on the Readiness Review Comment Record (Attachment 3). When agreement cannot be reached, the Board Chairperson shall decide on the resolution. If disagreement still exists, final resolution shall be provided by the RPD Manager.

5.7 Approve Checklist and Prepare Readiness Review Record Memorandum

- 5.7.1 The Board shall approve the completed Checklist.
- 5.7.2 The Team Secretary shall prepare the Readiness Review Record Memorandum and forward it to the Team Leader.
- 5.7.3 The Team Leader shall review and approve the Memorandum and forward it to the Board.
- 5.7.4 The Board shall approve the Memorandum and prepare and transmit written evaluation and recommendation of readiness to the RPD Manager for RFI/RI activities. The responsible Division Manager shall receive this memorandum for activities that are not RFI/RI.
- 5.7.5 The RPD Manager shall review and approve or disapprove the recommendations submitted by

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the Board for RFI/RI activities. The responsible Division Manager shall perform this function for other activities.

- 5.7.6 The Manager shall then transmit the decision to the affected organization(s) and contractor(s)/subcontractor(s).

5.8 Documenting the Readiness Review Decision

- 5.8.1 The Team Secretary shall incorporate the RPD Manager's record of decision in the Final Readiness Review Memorandum.
- 5.8.2 The Team Secretary shall distribute copies of the final Memorandum to the RPD Manager, Board Chairperson, Team Leader, EM Department Quality Assurance Program Manager, and affected organizations and contractor(s)/subcontractor(s).
- 5.8.3 The Team Secretary shall submit the final Memorandum to the EM Department Records System in accordance with the EM Department Records Management Procedure.

6.0 REFERENCES

1. Final Environmental Restoration Inter-Agency Agreement, August 17, 1990.
2. Rocky Flats Plant Site-Wide QAPjP for CERCLA Remedial Investigations/Feasibility Studies and RCRA Facility Investigations/Corrective Measure Studies Activities.
3. Rocky Flats Plant Environmental Management Department Quality Assurance Program Description.
4. 3-21000-ADM-02.01, Personnel Qualification and Training.
5. 3-21000-ADM-05.05, Document Review.
6. 3-21000-ADM-17.01, Records Management

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7.0 RECORDS

Records packages consisting of checklist and attachments generated as a result of implementing this procedure shall be assembled and submitted to the EM Department Records Center in accordance with requirement(s) specified in EM Department Procedure 3-21000-ADM, 17.01 Records Management.

The Readiness Review Record Memorandum shall be considered a QA record and shall be maintained and processed in accordance with the requirements of Section 17 of the EM QAPD.

8.0 ATTACHMENTS

Figure 1: Readiness Review Flow Chart

Attachment 1: Readiness Review Notice

Attachment 2: Readiness Review Board Selection Record

Attachment 3: Readiness Review Comment Record

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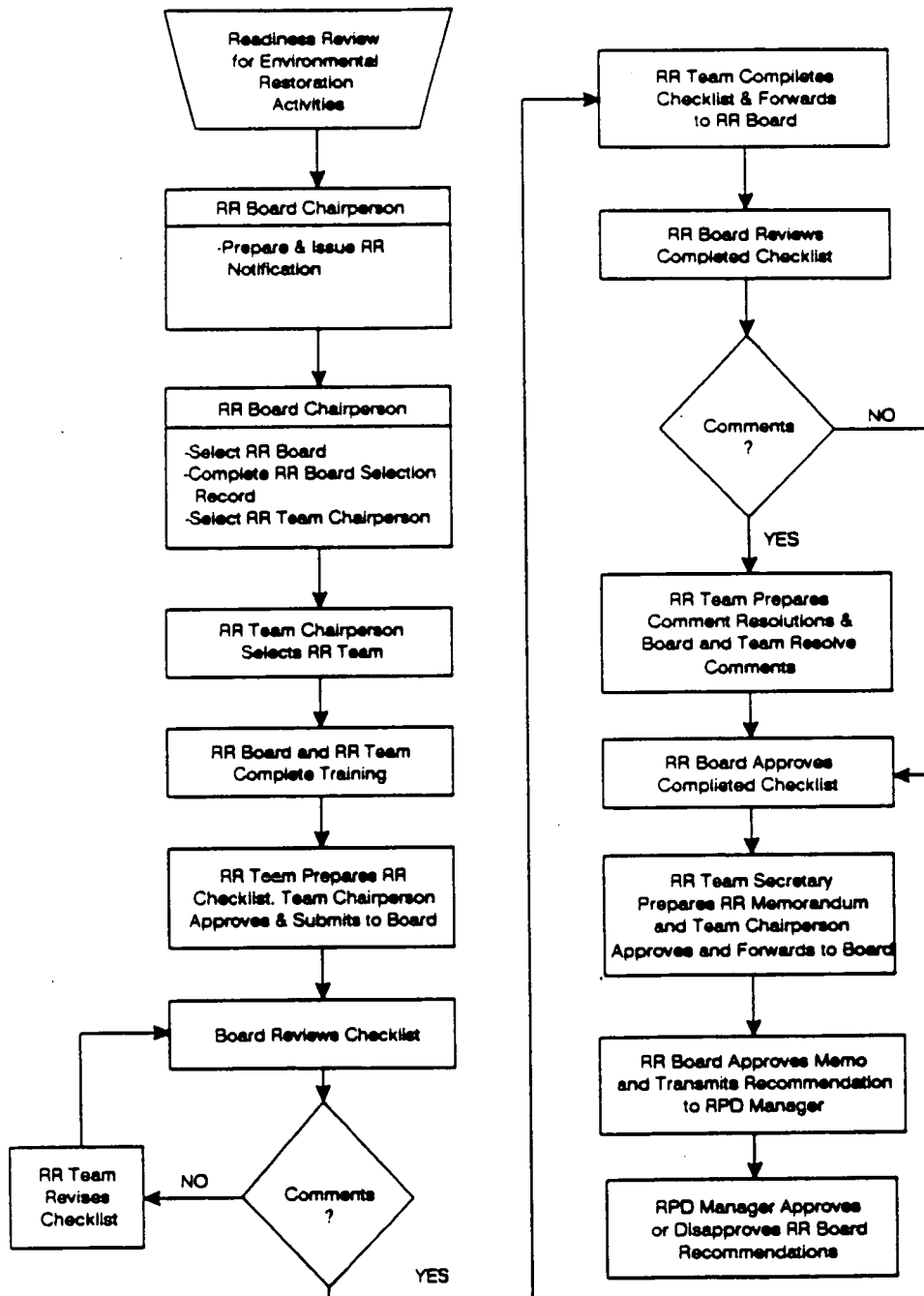
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Figure 1 - Readiness Review Flow Chart



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Attachment 1 - Readiness Review Notice

READINESS REVIEW NOTICE

To: _____ Date: _____

Activity to Be Reviewed: _____

WBS No.: _____

Review Date: _____ Location: _____

Readiness Review Board Chairperson: _____

Based on review of the qualification documentation, this Readiness Review Board Chairperson is qualified to execute the responsibilities with respect to the scope and purpose of this Review.

Scope and Applicability of Readiness Review:

Other Information:

Signed: _____

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Attachment 2 - Readiness Review Board Selection Record

READINESS REVIEW BOARD SELECTION RECORD

READINESS REVIEW TITLE _____

FUNCTION

REPRESENTATIVE

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

I have reviewed the qualifications of the above representative and have determined that, for the indicated function, they are acceptable as Board members to accomplish the scope and purpose of this review.

Signed _____
Readiness Review Board Chairperson

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Attachment 3 - Readiness Review Comment Record